

REMARKS

No amendments, cancellations, or additions have been made to the claims of the presently claimed case. As such, claims 1-30 are currently pending in the case. Further examination and reconsideration of the presently claimed application are respectfully requested.

Allowed Claims:

Claims 9-13, 17-22, and 28-30 were allowed. Applicant appreciates the Examiner's allowance of these claims and eagerly awaits allowance of the remaining claims.

Objections to the Claims:

Claim 15 was objected to as being dependent upon a rejected base claim (claim 14). Applicant sincerely appreciates the Examiner's recognition of the patentable subject matter recited in this claim. However, as will be set forth below, Applicants assert that claim 14 and claim 15 dependent therefrom are patentably distinct over the cited art. Accordingly, removal of this objection is respectfully requested.

Interview Summary:

In an interview between Examiner Abdullahi Elmi Salad and Patent Agent Mollie Leitang on July 1, 2003, certain limitations of the present case were discussed as being distinct from the cited art. In particular, the limitation of forming a model of logical structure of an electronic document was discussed as not being taught by the cited art. Such a limitation is included in claims 1 and 23. Further discussion was focused on the limitation of claim 14 specifying a user agent of a client machine configured to form a transcoded document object model (DOM) in response to the receipt of a script provided by a transcoder proxy. Examiner Salad indicated that both matters of discussion appeared to offer distinctions between the presently claimed case and the cited art and, therefore, may overcome the rejections cited in the Office Action upon further review. As set forth in more detail below, none of the cited art teaches or suggests the limitations of the presently claimed case. As such, the presently claimed case is asserted to be patentably distinct over the cited art.

Section 102 Rejections:

Claims 1-8, 14, 16 and 23-27 were rejected under 35 U.S.C. § 102(c) as being anticipated by U.S. Patent No. 6,311,215 to Bakshi et al. (hereinafter referred to as "Bakshi"). The standard for "anticipation" is one of fairly strict identity. A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference. *Verdegaal Bros. v. Union Oil Co. Of California*, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987), MPEP 2131. Bakshi does not disclose all limitations of the currently pending claims, some distinctive limitations of which are set forth in more detail below. As such, the § 102(e) rejection of claims 1-8, 14, 16 and 23-27 is respectfully traversed.

**Bakshi does not teach or suggest a transcoder proxy which is configured to form a model of a logical structure of an electronic document and use the model to produce a script that includes at least a portion of the electronic document.** Claim 1 recites in part:

A system for delivering an electronic document, comprising: a transcoder proxy coupled to receive the electronic document in a first digital format ... wherin the transcoder proxy is configured to ... form a model of a logical structure of the electronic document; use the model to produce an original script that includes: (i) at least a portion of the electronic document expressed in a second digital format, and (ii) the element and the identifier assigned to the element ...

Claim 23 includes a similar limitation. Bakshi does teach a system which includes transcoding server 34 that is configured to provide transcoding services to network client 12. Bakshi defines the term "transcode" in column 4, lines 3-7, as "... virtually any type of addition, deletion or modification of data transmitted to or from network client 12 by or through transcoding server 34. Examples of such transcoding services include data compression, image scaling, and dynamic removal of predetermined content." There is, however, no teaching or suggestion in Bakshi that transcoding server 34 is configured to form a model of logical structure for received electronic documents as recited in the presently claimed case. Consequently, Bakshi does not teach or suggest using a model of logical structure to produce a script that includes at least a portion of a received electronic document. Without any teaching or suggestion to form a model of logical structure for an electronic document, Bakshi does not provide any motivation for transcoding server 34 to have such a configuration. Consequently, claims 1 and 23 are asserted to be patentably distinct over Bakshi.

Bakshi does not teach or suggest a client machine with a user agent configured to form a transcoded document object model (DOM) in response to the receipt of a script provided by a transcoder proxy. Claim 14 recites in part: “[a] client machine, comprising ... a user agent ... adapted for coupling to a transcoder proxy, wherein the user agent is configured to: receive an original script from the transcoder proxy ... and form a transcoded DOM in response to the original script ...” As noted above, Bakshi does not teach a system which includes a transcoder proxy configured to form a model of logical structure for an electronic document. Likewise, Bakshi does not teach a client machine with a user agent which is configured to form a transcoded DOM in response to the receipt of a script provided by a transcoder proxy. In fact, Bakshi does not even mention forming a DOM. As such, Bakshi does not anticipate the limitations of claim 14. In addition, there is no motivation for Bakshi to form a DOM in response to receiving an original script from transcoding server 34, since there is no teaching or suggestion within Bakshi of modifying the content sent to network client 12. More specifically, there is no teaching or suggestion within Bakshi to have network client 12 configured to provide transcoding server 34 with event information pertaining to the content originally sent to network client 12 such that a modified script may be delivered to the network client. As such, it is asserted that claim 14 is patentably distinct over Bakshi.

For at least the reasons stated above, Bakshi does not teach or suggest the limitations of claims 1, 14, or 23. Therefore, claims 1, 14, and 23, as well as claims dependent therefrom, are patentably distinct over Bakshi. Accordingly, removal of this rejection is respectfully requested.

### CONCLUSION

This response constitutes a complete response to all issues raised in the Office Action dated April 9, 2003. In view of the remarks traversing the rejections presented therein, Applicants assert that pending claims 1-30 are in condition for allowance. If the Examiner has any questions, comments, or suggestions, the undersigned attorney earnestly requests a telephone conference.

No fees are required for filing this amendment; however, the Commissioner is authorized to charge any additional fees, which may be required, or credit any overpayment, to Conley Rose, P.C. Deposit Account No. 03-2769/5468-03200.

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